

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

In re: Ethicon, Inc., Pelvic Repair Systems
Products Liability Litigation

MDL: 2327

THIS DOCUMENT RELATES TO ALL CASES

**APPLICATION OF CHRISTOPHER M. PLACITELLA FOR APPOINTMENT
TO THE PLAINTIFFS' STEERING COMMITTEE**

In accordance with Paragraph 19 of Pretrial Order No. 1 (Initial Conference and Case Management Order), the undersigned makes this Application to the Court for appointment to the Plaintiffs' Steering Committee as follows:

1. I am a shareholder of the firm Cohen, Placitella & Roth, P.C., with principal offices in Philadelphia, Pennsylvania and Red Bank, New Jersey. I am resident in and Managing Partner of the New Jersey office. I have been engaged in the practice of complex litigation throughout my career, and am a specialist in product liability, toxic and mass tort litigation. I am nationally known for fighting for the rights of asbestos victims, and I participated as trial counsel in the largest consolidated asbestos trial in New York City history, as well as obtained the largest punitive damage verdict against an asbestos company in New Jersey's history. I have also participated as one of the lead trial counsel in the largest environmental tort settlement on behalf of individuals (\$38.5 million) in New Jersey history.

2. I have dedicated my career to working on behalf of victims of corporate misconduct and fraud. I volunteer my time to numerous consumer advocacy groups, including: National Board of Trial Lawyers for Public Justice; Counsel to Consumers for Civil Justice; Vice President of the New Jersey Public Interest Law Center; Advisor to Workplace Environmental

Counsel; Advisor to the Coalition to End Childhood Lead Poisoning; and, Former President, New Jersey Trial Lawyers (ATLA-NJ).

3. I have received numerous awards throughout my career, including the “Gold Medal,” the highest award that can be bestowed on a New Jersey trial attorney by peers for my dedication in fighting for the rights of victims of environmental pollution. I have also received the “Pioneer Award” by Consumers for Civil Justice (New Jersey’s largest consumer advocacy organization) for my fight for the rights of New Jersey consumers and tort victims and the “Meritorious Service Award” presented by the New Jersey White Lung Association for my fight for the rights of asbestos victims.

4. I have professional experience serving in numerous leadership roles in complex litigation, including: Member, Steering Committee for National Multi-District Asbestos Litigation; Special Counsel to all State Court Litigants in the National Diet Drug Litigation; Class Counsel, Johns Manville Class Action Suit; Class Counsel, New Jersey Diet Drug Litigation; Member, Steering Committee for National 23 Multi-District TMJ litigation; Member, Steering Committee for National Rezulin Litigation; and, Lead Counsel for New Jersey State Wide Propulsid Litigation.

5. I have professional experience in pelvic mesh litigation, as counsel to numerous plaintiffs alleged to have been injured by pelvic mesh products. In particular I am counsel to over 250 plaintiffs in the centralized litigation against Ethicon and C.R. Bard, Inc. pending before the Honorable Carol E. Higbee, P.J.Cv., of the Superior Court of New Jersey. Since 2010, Jillian A. S. Roman, Esq. of my firm has served as Plaintiffs’ Co-Liaison Counsel in the Ethicon litigation. My firm is therefore very actively involved in that litigation, including assisting in coordinating consolidated pre-trial discovery, acting as a spokesperson on behalf of

all plaintiffs during pretrial proceedings, coordinating and attending meetings with Plaintiffs' counsels, and coordinating motions, briefing, and other responses to matters posed by other parties or matters by and to the court, among other things.

6. Given my firms' considerable involvement in pelvic mesh litigation, including our hundreds of filed cases and our involvement in the centralized litigation pending in the Superior Court of New Jersey, I have a significant interest in the prosecution of this coordinated litigation and in participating in these proceedings as a member of the Plaintiffs' Steering Committee. I am ready, willing and able to commit myself, and the resources of my firm, to the prosecution of this litigation. I am able to and do work cooperatively with others, as my prior experience in numerous complex litigation leadership roles demonstrates.

7. I have read the *Plaintiffs' Proposed Counsel Organizational Structure* plan filed with the Court for MDL Nos. 2325, 2326 and 2327, and I join in support of that recommendation. It would be my distinct honor to serve as a member of the Plaintiffs' Steering Committee in this litigation.

For all the reasons stated above, I respectfully submit that I meet Your Honor's criteria for membership on the Plaintiffs' Steering Committee, and I respectfully request that this Court appoint me to serve on the Plaintiffs' Steering Committee in the *In re: Ethicon, Inc., Pelvic Support Systems Product Liability Litigation*, MDL No. 2327.

Dated this 28th day of March, 2012

Respectfully Submitted,

/s/ Christopher M. Placitella
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